

EXHIBIT 1

From: Maxwell Pritt <mpritt@BSFLLP.com>
Sent: Tuesday, October 29, 2024 10:03 AM
To: Hartnett, Kathleen; Morton, Phillip
Cc: Stameshkin, Liz; David Simons; Lauter, Judd; Angela L. Dunning; mlemley@lex-lumina.com; Ghajar, Bobby A.; Ghazarian, Colette A; Jesse Panuccio; Poppell, Cole A; Biksa, Liene; Weinstein, Mark; Alvarez, Jessica; Holden Benon; Christopher Young; Aaron Cera; Cadio Zirpoli; Joe Saveri; Margaux Poueymirou; Ashleigh Jensen; Rya Fishman; Matthew Butterick; Nada Djordjevic; James Ulwick; Bryan L. Clobes; Mohammed Rathur; Amy Keller; David Straite; Ruby Ponce; Alexander Sweatman; Heaven Haile; Llama BSF; Josh Schiller; David Boies; z/Meta-Kadrey
Subject: RE: Kadrey v. Meta - Depositions

[External]

Plaintiffs will file an administrative motion by EOD today to amend that interim deadline (which Plaintiffs had proposed and regardless the Court did not sign off on until after the interim deadline had passed, and while the parties were both still meeting and conferring and awaiting Judge Hixson's response to the request for a telephonic conference to address pending disputes and briefing schedules, which Meta still wouldn't agree were at an impasse as to Plaintiffs' issues). We also intend to request a status conference on the issue of appointing Mr. Garrie as referee. If Meta withdraws the objection below and/or agrees to stipulate to amend the interim deadline (even though, again, Plaintiffs do not believe is necessary), however, we will consider withdrawing our request to appoint a referee at this time. Plaintiffs are prepared to meet and confer on these issues at the 11:00am meet and confer to the extent Meta wishes to meet and confer to attempt to resolve them.

Best,
 Max

From: Hartnett, Kathleen <khartnett@cooley.com>
Sent: Tuesday, October 29, 2024 9:53 AM
To: Maxwell Pritt <mpritt@BSFLLP.com>; Morton, Phillip <pmorton@cooley.com>
Cc: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Angela L. Dunning <adunning@cgsh.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>; Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>
Subject: RE: Kadrey v. Meta - Depositions

CAUTION: External email. Please do not respond to or click on links/attachments unless you recognize the sender.

Max,

Your email does not dispute (nor could it) that the Court-ordered deadline for “Letter Briefs re: Existing Written Discovery” was October 23, 2024 and that Plaintiffs failed to meet that deadline. That deadline can be altered only by order of Judge Chhabria. See Civil L.R. 6-1(b) (“A Court order is required for any enlargement or shortening of time that alters an event or deadline already fixed by Court order or that involves papers required to be filed or lodged with the Court (other than an initial response to the complaint).”). Absent a stipulation requesting such a Court order, a party must file a “motion pursuant to Civil L.R. 6-3.” *Id.* Civil L.R. 6-3 in turn sets forth the requirements for such a motion, as does Federal Rule of Civil Procedure 16(b)(4) (“A schedule may be modified only for good cause and with the judge’s consent”).

You will recall that the October 23 deadline was among several that the parties negotiated and included in the stipulation, which also included an October 16 deadline to “Meet and Confer re: Existing Written Discovery,” an October 18 deadline to “Serve Additional Written Discovery Requests,” and an October 21 deadline to “Exchange Supplemental Initial Disclosures.” Meta satisfied and complied with each of those deadlines.

Rather than acknowledge that Plaintiffs failed to meet the Court-ordered deadline and/or provide any of the showings required by Federal Rule 16 and Civil L. R. 6-3, you instead baselessly seek to blame Meta for Plaintiffs’ lapse and threaten to seek sanctions. Neither Meta nor its counsel have done anything wrong, and your contention that Plaintiffs’ disputes were “met repeatedly with delay and silence on multiple issues and multiple requests” is demonstrably false. We met and conferred with Plaintiffs regarding their purported issues with Meta’s existing discovery responses for three hours on October 16. Your team then took the position that there was an impasse as to various issues. We thereafter followed up with a lengthy email on October 21 memorializing our positions regarding your various claimed disputes, including to explain that many were not in fact disputes and/or were in the course of being resolved. At no time did Plaintiffs provide a draft letter brief for us regarding any of these issues. Nor did Plaintiffs seek to alter the deadline for filing such a letter brief until yesterday; although your email did not acknowledge that you missed the deadline, it was implicit, as you sought a stipulation to a new schedule. And while you sought a telephonic conference with the Court (without disclosing to the Court what you planned to raise), that misses the point, because there was an October 23, 2024 deadline for filing “Letter Briefs re: Existing Written Discovery” and a conference with the Court is not a prerequisite to such a filing. As you know, the parties have previously briefed discovery issues without prior informal hearings, and if Plaintiffs sought to modify the page limit for any discovery motion they intended to file, they could have sought that relief before the deadline. We are aware of no good cause supporting your failure to meet the Court-ordered deadline, and thus we cannot agree to a stipulation to extend that deadline.

In the meantime, we reserve all rights, and this email should not be construed as a recitation of all of the facts supporting Meta’s position or describing Plaintiffs’ failure to comply with the stipulation and Order.

Thanks,
Kathleen

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Monday, October 28, 2024 9:53 PM

To: Morton, Phillip <pmorton@cooley.com>

Cc: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd

<jlauter@cooley.com>; Angela L. Dunning <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>; Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Re: Kadrey v. Meta - Depositions

[External]

Phil,

I think we've worked things out to confirm Mr. LeCun's deposition on 11/21 in Palo Alto. Thank you.

Best,
Max

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Monday, October 28, 2024 4:22 PM

To: Morton, Phillip <pmorton@cooley.com>

Cc: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Angela L. Dunning <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>; Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Re: Kadrey v. Meta - Depositions

Thank you for you email, Phil. We can confirm 11/14 for Ms. Kallet's deposition in NYC, 11/15 for Ms. Fan's deposition in NYC, and 12/5 for Mr. Choudhury's deposition in the Bay Area. Regarding Mr.

LeCun's change in location for his deposition on 11/21 from NYC to Palo Alto, that does not work for us presently so please provide his additional availability (and locations) prior to 12/13. We also will let you know if that changes and we can make 11/21 work (or 11/22 if he's in Palo Alto and the date still works). Please also provide the additional availability prior to 12/13 for Messrs. Boesenberg and Acharya as the dates offered do not work.

Please advise when Meta will be producing custodial documents for the additional custodians ordered by Judge Hixson at the beginning of the month.

We understand we will be meeting and conferring tomorrow on any objections Meta intends to raise to our 30(b)(6) topics and identification of Meta's witnesses.

We will be sending over today a proposed briefing stip and admin motion to address extant discovery disputes, and we request Meta's prompt response.

Thank you.

Best,
Max

From: Morton, Phillip <pmorton@cooley.com>

Sent: Monday, October 28, 2024 3:36 PM

To: Maxwell Pritt <mpritt@BSFLLP.com>

Cc: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Angela L. Dunning <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>; Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

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Max-

Thank you for confirming Mr. Bell's deposition. We have the following additional depositions to offer: 1) Amanda Kallet – November 14 (NYC), 2) Angela Fan – November 15 (NYC), 3) Alex Boesenberg – November 14 (Bay Area), 4) Amrish Acharya – November 19 (Bay Area), and 5) Sy Choudhury - December 5 (Bay Area). Please confirm.

Due to Mr. LeCun's travel schedule, the location of Mr. LeCun's deposition will need to move to Palo Alto, CA, but it can still go forward on 11/21 as previously agreed.

We will circle back on the location of Ms. Pineau's deposition - we are confirming a law firm's space in Montreal. Mr. Edunov's deposition will take place at Cooley LLP, 3175 Hanover Street, Palo Alto, CA 94304

Regarding third party Mr. Roller, we are working with him to identify an alternative date. Other than Mr. Roller and Mr. Cox (which the parties are meeting and conferring about tomorrow), all of the Meta witnesses should now be scheduled for deposition.

Regarding the reproduction of documents, we have another reproduction going out today. As of today, over 90% of the documents subject to reproduction will have been reproduced (1,539 total documents reproduced). We have a small batch remaining (under 150 documents) that we expect will be completed by Thursday as we have previously communicated. We have also prioritized any documents related to Ms. Nayak so you have those in advance of the deposition.

Regarding the 30(b)(6) objections and responses, those will be served shortly. We will not be identifying any 30(b)(6) designees today as we are still confirming those designations with the witnesses, but it is our current expectation that we will be designating witnesses from the group of witnesses Plaintiffs already requested for deposition. Regarding this week's deposition, we will not be presenting Ms. Nayak on any 30(b)(6) topics.

Regarding your letter on the privilege log, as we told you Friday, while reserving and without waiver of any rights or objections, we will be providing an additional response this week.

We will respond separately to Mr. Forbush's email on Existing Written Discovery disputes.

Thanks,
Phil

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Monday, October 28, 2024 1:24 PM

To: Morton, Phillip <pmorton@cooley.com>

Cc: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd

<jlauter@cooley.com>; Angela L. Dunning <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>; Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

[External]

Counsel, we are still awaiting your responses to the issues below. Also, please provide the location for Ms. Pineau's deposition and Mr. Edunov's deposition.

Thank you.

Best,
Max

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Friday, October 25, 2024 2:50 PM

To: Morton, Phillip <pmorton@cooley.com>

Cc: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Angela L. Dunning <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>; Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

Counsel, we can confirm Mr. Bell on 12/11. Please get back to us on the other issues we've raised, including the reproduction of documents that don't anonymize commenters or cut off comments; the lack of custodial documents for Ms. Pineau who Meta represented was one of its original 10 custodians; the dates of 11/25 or 26 for Mr. Roller's deposition; the identity of Meta's 30(b)(6) designees by topic and any objections Meta intends to stand on; the issues we've raised regarding Meta's amended privilege logs and production of redacted/withheld

documents; and the several requests in Reed's 12:35PM email on discovery issues that, at least at that time, we were not yet at an impasse.

Thank you.

Best,
Max

From: Maxwell Pritt <mpritt@BSFLLP.com>
Sent: Friday, October 25, 2024 9:24 AM
To: Morton, Phillip <pmorton@cooley.com>
Cc: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Angela L. Dunning <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>; Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>
Subject: RE: Kadrey v. Meta - Depositions

Apologies, I understand you did already provide location for Ms. Nayak. Please let us know about the reproductions. Thank you.

Best,
Max

From: Maxwell Pritt <mpritt@BSFLLP.com>
Sent: Friday, October 25, 2024 9:11 AM
To: Morton, Phillip <pmorton@cooley.com>
Cc: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Angela L. Dunning <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>; Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey

<zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

Good morning, Phil and Liz.

We haven't heard back on the location for Ms. Nayak's deposition next Thursday, so please let us know today.

Please also confirm you will be re-producing today the corrected versions of documents that include the names of the individuals in comment bubbles and the complete/full comments. If you cannot produce them today, please confirm you will do so by Monday or provide an explanation of the timing and delay so we can raise it with the Court in next Tuesday's status report. Thank you.

Best,
Max

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Wednesday, October 23, 2024 2:43 PM

To: Morton, Phillip <pmorton@cooley.com>

Cc: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <DSimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Angela L. Dunning <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>; Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

Phil, we can confirm Mr. Clark on 11/13 instead of 11/14. We can also confirm Mr. Touvron on 12/3, Mr. Scialom on 12/5, and Mr. Bashlykov on 12/6. Regarding Ms. Nayak, can you please let us know the location for her deposition?

Thank you.

Best,
Max

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Wednesday, October 23, 2024 1:50 PM

To: Morton, Phillip <pmorton@cooley.com>

Cc: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Angela L. Dunning <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>; Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon

<hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

Apologies, Phil, that I can't confirm the week of 11/18 for Mr. Roller either. But I could confirm 11/25 or 11/26. Please let me know if we can lock either in.

Thank you.

Best,
Max

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Wednesday, October 23, 2024 12:58 PM

To: Morton, Phillip <pmorton@cooley.com>

Cc: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Angela L. Dunning <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>; Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

Unfortunately I can't confirm 11/1 in NY for Mr. Roller. If he is unavailable for his deposition in the 11/25-12/11 window, please let us know his availability the week of 11/18. Thank you.

Best,
Max

From: Morton, Phillip <pmorton@cooley.com>

Sent: Wednesday, October 23, 2024 12:49 PM

To: Maxwell Pritt <mpritt@BSFLLP.com>

Cc: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Angela L. Dunning <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>;

Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

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Max-

Mr. Roller is a third party and has specifically asked to have his deposition taken sooner. Please confirm.

Thanks,
Phil

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Wednesday, October 23, 2024 3:45 PM

To: Morton, Phillip <pmorton@cooley.com>

Cc: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Angela L. Dunning <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>; Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

[External]

Thanks, Phil. We'll get back to you on London dates and we appreciate you trying to coordinate them. We asked for Mr. Roller's availability between 11/25 and 12/11—please let us know re those weeks.

Best,

Max

From: Morton, Phillip <pmorton@cooley.com>
Sent: Wednesday, October 23, 2024 12:39 PM
To: Maxwell Pritt <mpritt@BSFLLP.com>
Cc: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Angela L. Dunning <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>; Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>
Subject: RE: Kadrey v. Meta - Depositions

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Max-

As an additional update, Stephen Roller will be available on Friday, November 1 (New York). Please confirm.

Thanks,
 Phil

From: Morton, Phillip
Sent: Wednesday, October 23, 2024 2:03 PM
To: Maxwell Pritt <mpritt@bsfllp.com>
Cc: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@bsfllp.com>; Lauter, Judd <jlauter@cooley.com>; Angela L. Dunning <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>; Jesse Panuccio <jpanuccio@bsfllp.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@bsfllp.com>; David Boies <DBoies@bsfllp.com>; z/Meta-Kadrey

<zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

Hi Max-

We have a few more deposition updates:

Mike Clark has a personal obligation that has arisen on November 14. His deposition will need to go forward on November 13 instead (still in Denver). Please confirm.

Regarding the EU/UK employee-witnesses, we were able to get them all scheduled during a single week in London. Hugo Touvron will be offered on Tuesday, December 3; Thomas Scialom will be offered on Thursday, December 5; and Nikolay Bashlykov will be offered on Friday, December 6th. Please confirm.

Thanks,
Phil

From: Morton, Phillip <pmorton@cooley.com>

Sent: Tuesday, October 22, 2024 3:01 PM

To: Maxwell Pritt <mpritt@bsfllp.com>

Cc: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@bsfllp.com>; Lauter, Judd <jlauter@cooley.com>; Angela L. Dunning <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>; Jesse Panuccio <jpanuccio@bsfllp.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@bsfllp.com>; David Boies <DBoies@bsfllp.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Re: Kadrey v. Meta - Depositions

Max-

We checked with Mr. LeCun again and he is available on Thursday, November 21, one of the days you specifically requested. Please confirm.

Thanks,
Phil

On Oct 22, 2024, at 11:50 AM, Maxwell Pritt <mpritt@bsfllp.com> wrote:

[External]

Thanks, Phil. Responses inline below in **red font**.

Best,
Max

From: Morton, Phillip <pmorton@cooley.com>

Sent: Tuesday, October 22, 2024 8:16 AM

To: Maxwell Pritt <mpritt@BSFLLP.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JISchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

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Max-

All of these witnesses have very busy work schedules, as well as family and personal obligations that they have to move around for these depositions. As you may have noticed, we have tried to give you witnesses in the requested date ranges wherever possible, including Mr. LeCun and Ms. Nayak. Regarding Ms. Nayak, if we are going to meet this schedule we need to get at least one deposition on calendar before November. **We disagree that busy work schedules—which of course are commonplace—could possibly excuse Meta not providing multiple dates in a two-month window. And we have immediately accepted almost all of the other single deposition dates for witnesses that Meta provided after receiving your emails as to those witnesses and dates. Also, to be clear, we asked for dates starting this Friday and Meta has provided a single witness in October. As for Ms. Nayak, I said the single date provided (Halloween) was difficult and asked for other dates around that time (or other times), but Meta refused to provide any. In any event, we will make that date work for Ms. Nayak. We cannot make the single date offered for Mr. LeCun work so please provide alternate dates.**

We are continuing to work on scheduling people in London, which is complicated by the fact we are voluntarily bringing employee-witnesses from Paris to London. We hope to have that resolved soon. **Thank you.**

Regarding Mr. Rodriguez, we updated the initial disclosures last night. **We asked that Meta provide his last known contact information—please do so. In any event, as he is still on your Rule 26 disclosures and thus someone Meta represents it may use to support its claims or defenses so Meta must produce him for deposition. Please let us know his availability for deposition and where you will make him available.**

With respect to Mr. Cox, we believe under the apex doctrine and in view of other depositions and discovery sought, his deposition should not go forward. We would like to understand why Plaintiffs have suddenly identified him. In the event the Court is inclined to permit his deposition, we believe it should be extremely limited in time. **We disagree with your characterization on timing. We also disagree any deposition of Mr. Cox should be limited but are happy to schedule a meet and confer. In the meantime, as requested, please provide his availability for deposition as we've requested.**

We also note that while Meta has been diligently identifying dates for witnesses and otherwise responding to your inquiries, we have received no response to our October 15 request for the depositions of Matthew Klam and Rachel Snyder. Please respond to this request today. Likewise, please provide availability for Mr. Farnsworth's deposition without further delay. **We disagree with your attempt to suggest that Meta has been diligent and Plaintiffs have not; that is incorrect and these sort of statements are not productive so hopefully we can leave them out moving forward. As for the dates you've requested, including now for Mr. Farnsworth, we will follow-up with the other firms who will be handling their depositions and ask them to get back to you as soon as possible.**

Thank you preparing the joint status report draft. We trust that it will be non-argumentative and reflect the progress that Meta and Plaintiffs have made scheduling Meta's depositions. **We hope so but welcome any redlines.**

Regards,
Phil

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Monday, October 21, 2024 11:07 PM

To: Morton, Phillip <pmorton@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com;

Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

[External]

Thanks, Phil.

Regarding Mr. LeCunn's and Ms. Nayak's depositions, given that Meta is refusing to provide any alternate dates we will include in the status report that the parties have a dispute as to their scheduling. Please confirm that the single dates you proposed initially are the only dates in the next two months these witnesses are available or can make themselves available.

We tentatively confirm Mr. Clark for 11/14. In addition, thank you for letting us know you will accept service of a subpoena on Mr. Roller—can you let us know his availability between 11/25 and 12/11?

Also, you we are still awaiting Meta's response to our request for clarification as to your representation of Aurelian Rodriguez in light of his identification on Meta's amended initial disclosures. Further, we are still waiting for your response on the other UK/EU witnesses before confirming Mr. Scialom for 12/5 in the hopes that the parties can agree to schedule those witnesses around the same time.

Regarding Mr. Cox, please let us now what you would like to M&C about and in the meantime provide his availability. We can meet and confer when you propose dates and times to M&C about 30(b)(6) topics.

Finally, Judge Hixson did not direct Plaintiffs to send you a draft status report by 9am pacific or even that we prepare the initial draft. But we will do so and provide it to you in advance of the noon deadline.

Best,
Max

From: Morton, Phillip <pmorton@cooley.com>

Sent: Monday, October 21, 2024 7:16 PM

To: Maxwell Pritt <mpritt@BSFLLP.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfillp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

CAUTION: External email. Please do not respond to or click on links/attachments unless you recognize the sender.

Maxwell –

As a further update, we can offer Mike Clark on Thursday, November 14 (Denver). We are also authorized to accept service of a deposition subpoena for Steven Roller.

Regarding Mr. LeCunn and Ms. Nayak, we are offering the dates they have available. Please confirm.

We would also like to meet and confer regarding your request for a deposition of Mr. Chris Cox.

Given we have a status report on depositions due tomorrow, please send us a draft by 9am Pacific Time.

Thanks,
Phil

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Monday, October 21, 2024 4:46 PM

To: Morton, Phillip <pmorton@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L.

<adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com;

Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica

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<cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli

<czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou

<mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman

<rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic

<ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes

<BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller

<akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce

<rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile

<hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller

<JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey

<zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

[External]

Hi Phil,

In response to your other email, we tentatively can confirm Chaya Nayak on 10/31 (SF), though that date is difficult so we would appreciate if you can let us know additional availability the following week.

We are still waiting to confirm Mr. Scialom for 12/5 until we hear back from you about the other UK/EU witnesses, and waiting to confirm Yann LeCun until we hear back about the alternate dates we requested.

Separately, Meta appears to have produced relatively few documents (little to no emails, mostly academic papers) from Ms. Pineau even though we understand was one of the initial custodians selected by Meta. Can you please confirm that Meta searched Ms. Pineau's custodial files (including all email and messaging accounts) for all potentially relevant and responsive information?

Thank you.

Best,
Max

From: Maxwell Pritt <mpritt@BSFLLP.com>
Sent: Monday, October 21, 2024 9:05 AM
To: Morton, Phillip <pmorton@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>
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Subject: RE: Kadrey v. Meta - Depositions

Thanks, Phil.

We get back to you re Mr. Scialom, but will you be proposing the other London/EU depositions around that same time to consolidate?

Can confirm re: Messrs. Kerr (11/26), Nho (12/6), and Rao (12/13).

For Mr. LeCunn, 11/22 does not work currently—could we make 11/21, 11/24, or even 11/23 work?

Best,
Max

From: Morton, Phillip <pmorton@cooley.com>

Sent: Monday, October 21, 2024 8:58 AM

To: Maxwell Pritt <mpritt@BSFLLP.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

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Subject: RE: Kadrey v. Meta - Depositions

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Counsel-

We can additionally offer Thomas Scialom on Thursday, December 5th (London). Please confirm this and the other four offered last night in the email immediately below.

Thanks,
Phil

From: Morton, Phillip <pmorton@cooley.com>

Sent: Sunday, October 20, 2024 11:11 PM

To: Maxwell Pritt <mpritt@BSFLLP.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile

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<JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey
<zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

Counsel-

We can additionally offer Yann LeCunn on Friday, November 22nd (New York), Logan Kerr on Tuesday, November 26th (Bay Area), Eugene Nho on Friday, December 6th (Bay Area), and Arun Rao on Friday, December 13th (Bay Area). Please confirm.

Thanks,
Phil

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Sunday, October 20, 2024 2:00 PM

To: Morton, Phillip <pmorton@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons
<dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L.

<adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com;

Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene
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<JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey

<zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

[External]

Thank you, Phil. Confirmed as to Ms. Pineau and Mr. Edunov on 11/6.

Best,
Max

From: Morton, Phillip <pmorton@cooley.com>

Sent: Sunday, October 20, 2024 5:59 AM

To: Maxwell Pritt <mpritt@BSFLLP.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons
<dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L.

<adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar,

Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

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Max-

Thanks. We will circle back on these.

As an update, we are offering Joelle Pineau on Wednesday, November 6th (Montreal) and Sergey Edunov on Wednesday, November 6th (Bay Area). Please confirm.

Thanks,
Phil

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Sunday, October 20, 2024 1:55 AM

To: Morton, Phillip <pmorton@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com;

Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Re: Kadrey v. Meta - Depositions

[External]

Phil,

In addition to the requested information below, please also provide dates between 11/11 and 12/14 for Susan Zhang, Thomas Scialom, and Sy Choudhury. We'd be providing these names in light of your assertion that you will not be representing Guillaume Lample, Edouard Grave, or Aurelien Rodriguez. We still intend to seek discovery from them but recognize the complications of doing so in the discovery period based on our understanding that they reside and work abroad. Thank you.

Best,
Max

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Friday, October 18, 2024 8:05 PM

To: Morton, Phillip <pmorton@cooley.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Re: Kadrey v. Meta - Depositions

Thank you, Phil.

Aurelian Rodriguez is on Meta's amended initial disclosures and says contact through Cooley--please advise. If that is in fact no longer the case, please let us know when that changed and his last known contact information. Please also let us know the other former employees' last known contact information.

Best,

Max

From: Morton, Phillip <pmorton@cooley.com>

Sent: Friday, October 18, 2024 5:56 PM

To: Maxwell Pritt <mpritt@BSFLLP.com>; Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com <mlemley@lex-lumina.com>; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

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Counsel,

Thank you for sending the list of witnesses. We are assessing and actively working to identify dates of availability. We will circle back soon.

Regarding Guillaume Lample, Edouard Grave, Aurelien Rodriguez, and Steven Roller, we do not currently represent these former employees and are therefore not authorized to accept service for these individuals.

Please let us know how you intend to proceed. If you intend to forego these depositions and take others in their place, we would need to know that immediately and reserve all rights.

Thanks,
Phil

From: Maxwell Pritt <mpritt@BSFLLP.com>

Sent: Thursday, October 17, 2024 4:54 PM

To: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Hartnett, Kathleen <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfillp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

[External]

Counsel,

We presently intend to notice depositions of the following individuals. Please let us know the following witnesses' availability between 10/24 and 11/8, and confirm their locations: Angela Fan, Mike Clark, Joelle Pineau, Chaya Nayak, and Sergey Edunov. Please let us know the following witnesses' availability between 11/11 and 11/27, and confirm their locations: Guillaume Lample, Edouard Grave, Nikolay Bashlykov, Alex Boesenberg, Yann LeCunn, Amanda Kallet, Aurelien Rodriguez, and Hugo Touvron. We understand some of these individuals are former Meta employees so please let us now if you will be representing those individuals. Finally, please let us know the following witnesses' availability between 12/2 and 12/13: Logan Kerr, Chris Cox, Eugene Nho, Steven Roller, Sean Bell, Amrish Acharya, and Arun Rao. If any individuals are not available in the requested date ranges, please let us know their subsequent availability (or for those in the later date range, all of their availability before 12/13).

Also, we have asked repeatedly that Meta identify PMKs for our topics, including again on yesterday's M&C—please do so and provide their availability, or let us know by when you will provide that information, so that we can include it in the Tuesday report to Judge Hixson.

Thank you.

Best,
Max

From: Maxwell Pritt

Sent: Tuesday, October 15, 2024 4:31 PM

To: Stameshkin, Liz <lstameshkin@cooley.com>; David Simons <DSimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: RE: Kadrey v. Meta - Depositions

Thank you, Liz. We will endeavor to do so tomorrow. Please let us know tomorrow as well who you will be designating for each of the 30(b)(6) topics in the amended notice we served a week ago.

Best,
Max

From: Stameshkin, Liz <lstameshkin@cooley.com>

Sent: Tuesday, October 15, 2024 4:06 PM

To: David Simons <dsimons@BSFLLP.com>; Lauter, Judd <jlauter@cooley.com>; Dunning, Angela L. <adunning@cgsh.com>; Kathleen Hartnett <khartnett@cooley.com>; mlemley@lex-lumina.com; Ghajar, Bobby A. <bghajar@cooley.com>; Ghazarian, Colette A <cghazarian@cooley.com>

Cc: Jesse Panuccio <jpanuccio@BSFLLP.com>; Poppell, Cole A <CPoppell@cooley.com>; Biksa, Liene <lbiksa@cooley.com>; Weinstein, Mark <mweinstein@cooley.com>; Alvarez, Jessica <jalvarezlopez@cooley.com>; Holden Benon <hbenon@saverilawfirm.com>; Christopher Young <cyoung@saverilawfirm.com>; Aaron Cera <aCera@saverilawfirm.com>; Cadio Zirpoli <czirpoli@saverilawfirm.com>; Joe Saveri <jsaveri@saverilawfirm.com>; Margaux Poueymirou <mpoueymirou@saverilawfirm.com>; Ashleigh Jensen <ajensen@saverilawfirm.com>; Rya Fishman <rfishman@saverilawfirm.com>; Matthew Butterick <mb@buttericklaw.com>; Nada Djordjevic <ndjordjevic@dicellolevitt.com>; James Ulwick <Julwick@dicellolevitt.com>; Bryan L. Clobes <BClobes@caffertyclobes.com>; Mohammed Rathur <MRathur@caffertyclobes.com>; Amy Keller <akeller@dicellolevitt.com>; David Straite <dstraite@dicellolevitt.com>; Ruby Ponce <rponce@saverilawfirm.com>; Alexander Sweatman <ASweatman@caffertyclobes.com>; Heaven Haile <hhaile@saverilawfirm.com>; Llama BSF <Llama_BSF@bsfllp.com>; Josh Schiller <JiSchiller@BSFLLP.com>; David Boies <DBoies@BSFLLP.com>; Maxwell Pritt <mpritt@BSFLLP.com>; z/Meta-Kadrey <zmetakadrey@cooley.com>

Subject: Kadrey v. Meta - Depositions

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Counsel,

In view of the Court's order today, please provide us with the list of witnesses whose depositions Plaintiffs intend to take. We need these right away to investigate their availability and comply with Judge Hixson's instructions. We ask to receive this list by tomorrow.

In addition, please provide dates and locations for the depositions of Matthew Klam and Rachel Snyder. We reserve all rights with respect to Christopher Farnsworth pending the outcome of the consolidation decision.

Best,

Liz

Elizabeth L. Stameshkin

Cooley LLP
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Pronouns: she, her, hers

Cooley is committed to [racial justice](#)

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